I believy certify that this correspondence is being deposited with the U.S. Postal commissioner for Patents, P.O. Box 1450, Alexandria, VA 22113-1450, on the date shown below.

Dated: January 3, 2005 Signature:

Docket No.: 29936/39473

(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:

Cha Deok Dong et al.

Application No.: 10/618,978

Confirmation No.: 5905

Filed: July 14, 2003 Art Unit: 2818

For: METHOD OF MANUFACTURING FLASH Examiner: Renee R. Berry

MEMORY DEVICE

COMMENT ON STATEMENT OF REASONS FOR ALLOWANCE

Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Dear Sir:

In addition to the reasons for allowance set forth in the allowance papers that were mailed in connection with the present application, it is respectfully submitted that the claims are allowable for the additional reasons that the invention defined by the language of the claims is neither anticipated by, nor would have been obvious when taken as a whole in view of, the art of record.

Dated: January 3, 2005

Respectfully submitted,

Michael RV. Helly

Registration No. 35,902

MARSHALL, GERSTEIN & BORUN LLP

233 S. Wacker Drive, Suite 6300

Sears Tower

Chicago, Illinois 60606-6357

(312) 474-6300

Attorney for Applicant